

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RAJENDRA BADGAIYAN, M.D.,

Plaintiff,

v.

**ANTHONY J. PRINCIPI, Secretary,
Department of Veteran's Affairs, et als,
Defendants.**

Civil Action No.

04-12031 JLT

**JOINT MOTION TO EXTEND TIME TO COMPLETE DEPOSITIONS AND
FILE DISPOSITIVE MOTIONS**

Defendants, Anthony J. Principi, Secretary, and the Department of Veteran's Affairs (the "VA"), Grace Mushrush ("Mushrush"), the President and Fellows of Harvard College ("Harvard"), and the Plaintiff, Rajendra D. Badgaiyan ("Badgaiyan") respectfully request that this Court extend the time to complete depositions, and file dispositive motions in the above-referenced matter as follows:

1. All depositions completed by June 31, 2006;
2. Dispositive motions filed August 15, 2006.

Counsel for all parties have conferred and move jointly with respect to this request because the scheduling of depositions has been delayed to accommodate the schedule an out-of-state witness who agreed to travel to Massachusetts to be deposed, as well as the schedules of the parties and their counsel.

WHEREFORE, for the foregoing reasons, all of the Defendants and the Plaintiff respectfully submit that good cause exists for the Court to grant their Motion.

Respectfully Submitted,

RAJENDRA BADGAIYAN, M.D.

**PRESIDENT AND FELLOWS OF
HARVARD COLLEGE,**

By his Attorney,

/s/ Gregory R. Barison
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Date: May 30, 2006

Dated: May 30, 2006

**ANTHONY J. PRINCIPI, SECRETARY &
DEPARTMENT OF VETERAN'S AFFAIRS &
GRACE MUSHRUSH,**

/s/ Rayford Farquhar
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Dated: May 30, 2006